UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
V.)	Criminal No. 05-10035 PBS (MBB)
MARYSOL MORALES)	
)	
)	

JOINT MOTION FOR EXCLUSION OF TIME FROM SPEEDY TRIAL CALENDAR

The United States hereby jointly move for an order pursuant to Title 18, United States Code, Section 3161(h)(8)(A), excluding the period from October 12, 2005 through April 24, 2006 (the currently-scheduled trial date in this case) from the computation of time within which the trial in this case must commence.

An order permitting such exclusion may properly be entered based upon a finding by the Court that the ends of justice served by granting such an exclusion outweigh the best interests of the public and the defendant in a speedy trial. As grounds for such a finding, the parties agree that the interests of justice warrant scheduling the trial at a time when the parties' respective counsel are available to represent their clients and at a time which will permit counsel adequate time, in light of their other professional commitments, to prepare for trial.

Respectfully submitted,

MICHAEL J. SULLIVAN	J.W. CARNEY, JR. ESQ.
United States Attorney	
	/s/ J.W. Carney (by PGL)
by: <u>/s/ Paul G. Levenson</u>	Carney & Bassil
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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non registered participants on this date.

dated: January 13, 2006

/s/ Paul G. Levenson
PAUL G. LEVENSON